



April 5, 2017

Mr. Scott Smithline
CalRecycle
1001 I Street, Mail Stop 10A-17
Waste Permitting, Compliance & Mitigation
Sacramento, CA 95812

Subject: Comments Regarding the Carpet America Recovery Effort Carpet Stewardship Plan for 2017-2021

Dear Mr. Scott Smithline,

We appreciate the opportunity to comment on the Carpet America Recovery Effort's (CARE) new carpet stewardship plan for 2017-2021. Van Duerr Industries, Inc. dba SafePath Products is the recipient of the first grant cycle under CARE for capital funding. As a result of CARE we are now in production of finished parts made from recycled carpet material and other recycled materials.

CARE has innovatively branded these multiple waste stream products "Double Green".

A designation that will increase the use of post-consumer recycled carpet material in existing products now being manufactured in California, thus adding both value and customer appeal to those products.

All this helps create California capacity, jobs, and reduction of material going into landfill.....isn't that what we all want?

Without CARE's assistance we would not have our operations up and running in Northern California, which is the first of its kind. Moreover, we have successfully developed multiple products using various waste stream materials to manufacture finished architectural building products.

The CARE program, in its first funding cycle, has created jobs and opportunities through product developers and inventors to advance the use of recycled carpet materials. The advancement of raw feedstock material conversion has provided a recent burst in product development that didn't exist inside the carpet industry as a whole until the last year.

New advanced products never before envisioned are now coming to light and are in production as a direct result of the CARE program. Most importantly, there is a substantial and significant amount of private investment and capital that has been brought to California as a direct result of the CARE program.

It is important to note that the various and disparate materials that come from recycled carpet have distinct material properties that offer great challenges to the manufacturing of end user products. Only recently has there been the integration of the waste carpet materials (WCM) with other recycled materials such as recycled rubber and plastic. The manufacturing of these products offer unique and often steep challenges to produce a value added end user product. Importantly, substantial advancement in this area has amplified under the CARE Stewardship Program. Without the CARE program we would not be witnessing the advancement of these products and the processes as they exist today. CARE has provided innovative market development ideas that are changing the dynamics of the recycling of multiple materials in California, and should not be ignored.

To majorly change this program at this time would wipeout much of the advancements made over the last couple years. CARE has been limited to one substantial grant program of which we are already seeing results. The new plan is achieving what it was designed for. To dismantle this program as such an early stage would undoubtedly retard growth, impact existing investments, and move the needle backwards for carpet recycling in California.

We suggest you may want to tweak the CARE program but please don't kill it.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Timothy Vander Heiden', is written over a faint, light blue circular stamp or watermark.

Timothy Vander Heiden J.D.
CEO

SafePath Products

Enc.
VDH:km